

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

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IN RE: (Chapter 11)
Case No.: 1-19-40115-NHL
GREEN GROUP 11 LLC,
Debtor. Hon. NANCY HERSHEY LORD

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GREEN GROUP 11 LLC,
Plaintiff, A.P. No.: 1-21-01171-NHL

v.

January 18, 2022

U.S. BANK NATIONAL ASSOCIATION AS
LEGAL TITLE TRUSTEE FOR TRUMAN 2016
SC6 TITLE TRUST,

Defendant.

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**NOTICE OF MOTION TO DISMISS COMPLAINT
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 12(b)(6)**

PLEASE TAKE NOTICE, that upon: the November 11, 2021 Declaration of Jonathan M. Robbin, Esq. of J. Robbin Law PLLC and accompanying exhibits; the accompanying Memorandum of Law; and all prior pleadings and proceedings herein, **Defendant, U.S. Bank National Association as Legal Title Trustee for Truman 2016 SC6 Title Trust**, will move this Court before the Honorable Nancy Hershey Lord, U.S.D.J. at the United States Bankruptcy Court for the Eastern District of New York located at 271 Cadman Plaza East – Suite 1595, Brooklyn, New York, 11201, on **January 18, 2022 at 3:30 p.m.** for an Order made applicable to this proceeding by Federal Rules of Bankruptcy Procedure 7012(b): (1) pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, dismissing, with prejudice, Plaintiff, Green Group 11 LLC's, Adversary Complaint; and (2) granting such other and further relief as this Court may deem just and proper.

Any hearing on the within application will be held telephonically only. No in-person hearing will be held in the Courthouse.

Any party appearing telephonically must comply with the Judge's Procedures posted on the Court's website at <https://www.nyeb.uscourts.gov/content/judge-nancy-hersey-lord>. Call-in Information: On the date and time set forth above, parties shall dial-in to the hearing using the following dialing instructions: dial number (888) 363-4734, using access code 4702754, at least 10 minutes before the scheduled hearing.

PLEASE TAKE FURTHER NOTICE, that responsive papers shall be filed with the Bankruptcy Court and served upon Counsel for Defendant, J. Robbin Law PLLC, by no later than seven (7) days prior to the hearing date set forth above. Any responsive papers shall be in conformity with the Federal Rules of Bankruptcy Procedure and indicate the entity submitting the response, the nature of the response and the basis of the response. You must also attend the hearing scheduled to be held at the date, time, and place set forth above.

PLEASE TAKE FURTHER NOTICE, that the hearing to consider the Motion may be adjourned without further notice other than by announcement of such adjournment in open Court.

PLEASE TAKE FURTHER NOTICE, that if no objections with respect to the Motion are timely filed and served, the Court may decide that you do not oppose the Motion and an Order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: Armonk, New York
November 11, 2021

J. ROBBIN LAW PLLC
/s/ Jonathan M. Robbin
By: Jonathan M. Robbin
Jacquelyn A. DiCicco
200 Business Park Drive, Suite 103
Armonk, New York 10504
(914) 685-5016
Jonathan.robbin@jrobbinlaw.com